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Office of International Affairs and
Seafood Inspection

NMFS Webinar: Proposed Rule on Electronic Reporting of Trade Data

Presenters: *Christopher Rogers, Assistant Director, Office of International Affairs and Seafood Inspection*
Dale Jones, Fisheries Program Specialist and ITDS Program Coordinator, Office of Science and Technology

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Coordinator: Welcome, and thank you for standing by. At this time all participants are in a listen only mode. After the presentation, we will conduct a question and answer session. To ask a question, you may press star 1. Today's conference is being recorded. If you have any objections, you may disconnect at this time. Your host for today's conference is Ms. Laurel Bryant. Thank you. You may begin.

(Laurel Bryant): Thanks a lot (Katie). And thank you everybody on the phone for joining us this afternoon. This is our second of two public webinars on the proposed rule in the federal register that was published December 29th, regarding the proposed rule for electronic reporting of trade data. And that proposed rule is open until February 29th for comment.

I know that we've got probably a lot of diverse people on the phone that are interested in seafood in general. Specifically, this webinar is probably targeting a lot of those that are really engaged with the software and entering of data. So if your head starts to spin, don't worry about it, we've got a good, long Q&A that will be following this and our presenters will be happy to provide further information and clarification.

Before I do introduce our speaker, I just want to go over a few things. One, we know that everybody is on the WebEx, just follow along. Please don't submit your comments through that, we can't see the window all of us and it's much easier if you enter into the queue on the conference call. And that's where we'll be able to capture you.

In addition to that, I just want to point out if you end up having some IT difficulty and you cannot see the WebEx, we do have a PDF of the power point loaded on to our website, at NMFS.noaa.gov and you go to the programs navigation button over to the left and click on "international affairs." And in about the middle of the page you will see a link that will take you directly to the splash page that has all the information, including a PDF of the Power Point.



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My last logistical thing I want to mention is that this will be not only recorded, we will have it transcribed and this will be posted to that web page as well. So if you missed this or you want more information, or you have colleagues, please direct them to that page.

And with that I'm going to introduce our speakers, we have with us today, (Chris Rogers) Assistant Director for International Fisheries Division of our Office of International Affairs and Seafood Inspection. (Chris) will be giving the first half of the presentation and he'll be followed by (Dale Jones), Fisheries Program Specialist and ITDS Program Coordinator with our Office of Science and Technology.

And with that, I'll turn it over to (Chris). (Chris)?

(Chris Rogers): Okay, thank you very much (Laurel). (Kerry) can you go to the first line that says overview of the presentation? Okay. Just a quick overview of what we'll present to you today. We'll do a quick introduction to ITDS, the International Trade Data System. An overview of the three national fishery service trade monitoring programs that will be integrated into ITDS. A description of that transition from our current entry processing, which involves paper submission to the National Marine Fisheries service into the future with ITDS, which will be electronic submission directly to Customs and border protection.

This transition will involve a creation of a consolidated trade permit, message set requirements for electronic data, document image, what we call a DIS -- a document imaging system. DIS requirements for certain paper forms that are required because of international requirements and then how our entries processed in (ACE) to look at that information and communicate with the fishery service.

As (Laurel) mentioned, we understand and accept that there are folks from different orientations on the call today. And we'll go through that a little bit at the end - the info of records has a certain role to play, the entry filer, our Customs broker, a software developer and then we want to encourage all of the parties to get engaged in our pilot testing of the message set and the document imaging systems for all three of these programs and we'll follow up with the Q&A session at the end.

Next slide please. So the International Trade Data System was born out of the Customs Modernization Act of 1993, which established a national Customs automation program. You'll often see on [the] Customs and work protection website, ACE\ITDS. ITDS, International Trade Data System is a concept but ACE the automated commercial environment is the mechanism -- the software



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mechanism -- by which the concept is realized. So the data will be submitted and read through what they call the ACE Portal, the Automated Commercial Environment.

The Safe Port Act passed in 2006, mandates that each a participating or partner government agency that has a role in making admissibility decisions for inbound products would use ACE ITDS as the single window. The concept of single window we'll present a little bit later on. But the important thing with the Safe Port Act is that it was a mandate that department government agencies participate, otherwise certainly it would not be a single window.

And finally, another driver of this rule making was the Executive Order issued by President Obama on February 19, 2014. It was *entitled Streamlining the Export Import Process* and it mandated that the single window be fully deployed, functional, and a participation by all of the partner agencies would be accomplished by December 2016. So we're on a pretty tight timeline to make that happen.

Why is (NMFS) involved? Well because the U.S. imports about 90% of its consumable seafood and several products are under trademarking requirements or embargoes or labeling requirements that are under the jurisdiction of the fishery service. So we are a partner government agency in ITDS.

Next slide please. So the ITDS model if you look at the left side, current flow of information involves a lot of paper with the so-called partner government agencies and the trades and Customs and border protection. It's less efficient when paper is being transferred back and forth between agencies. The trade Customs messaging can be become also a subject of delay when freight forward is wanting to pick up goods at the port, it's not clear if all agencies have received the information and cleared off on it and have a release of the goods.

So if you move to the right side of this slide, you will see the ACE portal is in the middle, the ITDS concept of the single window that the trade will communicate with, that single window to CBP and all of the partner government agencies that have a role to play in looking at the data or making admissibility decisions for those products. We'll have access to the data and near real time through the ACE portal.

Next slide please. So as I mentioned, particularly with the Executive Order and the time line to complete ACE integration for all agencies by December 2016, CBP has put up a countdown on one of their websites. Mandatory use of



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ACE for electronic benefits filing, it was already accomplished last year. The transition period began on November 1st of last year for ACE electronic data entry and of course, certain entry types. And February 28th, coming next month, the legacy system -- the automated commercial system -- or ACS will be turned off and ACE will become the only means of filing electronic submissions for entries. So ACE will be turned on - well ACE is on now, but it's not mandatory. ACE will be mandatory as of February 28th.

And some agencies, (NMFS) is not among them, but several agencies will require their data to be collected through the ACE portal at that time. Because we're still in the process of doing this rule making. We are in the next group of agencies that will be formally integrated into ITDS so our deadline - don't have an exact date in a month but it will be in July of 2016. So CBP will publish a final rule on mandatory ACE use as well as fishery service will publish our final rule and that will require that the electronic message set be submitted to ACE for the entries for the programs that we'll describe in a minute.

I would just note that on the bottom of that column, below July 2016, you'll see a note that hybrid submissions will no longer be allowed. That means that there can't be a combination of paper and electronic data. It has to be all electronic or all paper. And I presume that most folks would want to take advantage of the all-electronic filing. It will be easier, quicker and more efficient. And finally, to the extreme right, October 1st is the deadline mandatory use of ACE for all (TBP) cargo release processes. So we have an ambitious calendar and a lot of work to get done in between now and then.

Next slide please. So this particular proposal for (NMFS) ITDS integration, we will use the single window of ACE ITDS for collecting data at the point entry with an entry filing. There are three existing paper based programs that will be converted. The highly migratory species program or HMS, the Antarctic marine living resources program, AMLR and the Tuna Tracking and Verification Program, TTVP.

Certain commodities are subject to reporting. Again, currently paper based reporting for those three programs. And there is some overlap with HMS and TTVP because of the tuna products. The rule will require an import department and also that certain data be submitted via a message set as part of the entry processing. And certain forms will be submitted through ACE via the document imaging system, DIS.

Next slide please. Okay so the three (NMFS) method set programs - as I said highly migratory species, these are tunas and swordfish, Antarctic Marine Living Resources, primarily tooth fish and other Antarctic resources that may



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be imported US, they include krill and crab for the most part. This program is involving the tooth fish or Chilean sea bass imported from that region. And the NOAA Form 370, the fishery certificate of origin is part of our tuna tracking and verification program.

This program is instituted for protection of dolphins which can be, incidentally, (unintelligible) and the process of tuna fishing so we do have some requirements under the marine mammal protection act and the dolphin protection consumer information act that we have for through this tuna tracking and verification program. Basically, if a tuna product is imported into the United States with a dolphin safe label, we are collecting information to attest to and certify that the capture operation was in fact dolphin safe under our statutory definitions.

There are approximately 35 harmonized tariff scheduled codes for the various species or commodities that are affected by these programs. Totally, in the harmonized tariff schedule of the United States there are about 700 codes with respect to fisheries products. So we're not proposing in this rule that we're collecting information on all fisheries products, just those particular codes referring to the products that are monitored in these three programs.

However, most note at this point, some of you may be familiar with a separate ongoing activity. The Presidential Task Force on Combating Illegal Fishing and Seafood Fraud. And that task force has recommended additional products for monitoring that would be part of a separate rule making. So it won't be all of the 700 codes but we will add to that list of 35. So we'll keep you apprised of developments on that separate rule making.

Next slide please. So the primary products covered by these programs. Tunas are covered both in the highly migratory species monitoring program as well as the NOAA Form 370, Tuna Tracking and Verification program. Swordfish is covered under the highly migratory species program, tuna fish covered under the Antarctic Marine Living Resources Program.

So currently the paper documents are submitted post release directly to the national fishery service. These documents attest to the circumstances and conditions of the harbor's events. The NOAA Form 370 again is used to attest to the Dolphin Safe Labeling requirements as well as to screen yellow fin tuna imports because there are embargoes against certain countries. Nine countries are currently subject to a embargo for yellow fin tuna products.

Under the ITDS integration, most shipments for these three product groups will require the filing of a (NMFS) message set. That's the electronic data and a supplemental document through the document imaging system for those



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familiar with the Form 370 programs, the supplemental documents could include a Captain's Statement or an Observer's Statement describing the conditions of harvest and why it was a situation that did not result in dolphin injury or mortality.

Next slide please. So the proposal itself, again we're transitioning through electronic import export filing via the ACE single window. We'll utilize what we call Partner Government Agencies, the PGA message set to collect that data. It'll facilitate in electronic or automated authorization decisions for product shipment release. For any of you who may be tracking the whole ACE ITDS project, the discussion has been on this may proceed message, where your freight forward can pick up the goods at the port and that's what the single window will do for all agencies and CBP and it will result in - they say the one government, or all of government message on a may proceed.

We will utilize the imaging system to collect certain required international forms and eliminate the collection of all paper forms. So the rule would require the submissions through the ACE portal and no longer a requirement to submit those forms to National Fishery Service. We will use inter-operable web services to automate communications between fishery service and Customs. There will be messaging that will go back forth between Customs and the trades, (NMFS) will be copied on that with respect to any problems with that automated processing.

And we will use a secure file transfer protocol to receive the information about the entry collected by CBP. And not only the entry summary data but all of the (NMFS) data in its partner government agency's specific message set. With respect to the trade permit that I mentioned before, currently two of our programs have a permit. Separate permits so an importer must obtain both permits if they're importing commodities covered under both programs.

What we're doing in this rules proposing that we consolidate trade permits so that one single trade permit will be good for all of the three programs under which the data are being collected through ITDS. We will make the permit available through a web based national permitting system and it will be available essentially 24/7.

If a person making an entry or an importer finding out for the first time they need a permit, they should be able to obtain that permit in short order at any point in time and we will have, again through the interoperable web services, the ability to update the valid permit file on the CBP side of the ACE Portal. So that departments will validate, even if the person heading it known realized they needed one for that commodity. They can get one relatively quickly and that information will be updated on the CBP side in short order.



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So with that, I'll turn it over to (Dale), who is going to go through a little bit more detail of how we've constructed the message set requirements.

(Dale Jones): Okay thank you (Chris) and good day to everybody, we appreciate you joining us. Again, as (Chris) says, what I'd like to do is get into a little bit more detail about some of the technical requirements here and I'll probably reiterate or emphasize some of the things that (Chris) has said.

But while we're still on this slide, I would just emphasize the fact that this rule is really putting into place what is the National Marine Fishery Service portion of a government wide process. That of course includes everything, as I like to say, from fish to firearms, in the process of importing and exporting from the U.S. So everything will become digital.

Under the current and existing processes is the opportunity for paper filing. Some folks are filing the basic information required by Customs which is the entry and entry summary in an automated fashion, and have for years, through the automated broker interface. However, in the future as these things are implemented, everyone will have to use that process and having said that, I would emphasize slide number five, which you saw that shows the dates involved.

So if you do file anything electronically through the ACS system that will be shut off at the end of February so you'll have to file any entry or entry summary data through the ACE system at the end of February and use the automated broker interface ABI to do that.

So the next big date of course for NMFS as (Chris) has mentioned is July of this year. And at that point in time and in coordination with our proposed rule, whatever date that rule goes into effect, once we've gone through the entire rule making process sometime in July, we will be at a point where we will then begin collecting additional information that we now collect through paper. We will then collect in an automated manner through what Chris' has referred to as the PGA message set.

So you'll file electronically your entry, entry summary information in addition to that you'll file a little bit more information through the PGA message set and then any forms that you would have provided to us by paper in the past, you will just send one time only and you'll send that by uploading it or using email to provide it through the CBP ACE system.

So again, some folks will scan those in and upload the PDF version and send them directly through ACE. Other folks have already tested through the use



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of process as it involves the email, where there is a very, very specific directional piece of information that's put into the subject line that allows that email to be filed to and sent to the DIS system. Ultimately then to be passed on to us at the National Marine Fishery Service.

To set up the capture of this information through the message set, what we would do is provide them - have provided for your access is a directional document called the Implementation Guidelines and that's what I'm going to be talking about and showing you some excerpts from here in a minute.

And those implementation guidelines, if you have received the six page, five things document from us in the mail, if you look at footnote number eight, there's access - a link to those implementation guidelines. So that's one of the key pieces of specific direction you want to access. The other piece of direction that I'll mention is the (CATAIR) -- again that's C-A-T-A-I-rR, capital letters - which stands for the Customs and Trade Automated Interface Requirements for Partner Government Agencies. And there's a link in the document for access to that, instructions as well, if you want to access and look at that later on.

That gives you the very specific details of what the Customs agency requires in setting up these technical requirements. I'll ask for you to go ahead and move then to slide number ten. And on slide ten, through the next slides, including this one, what we have is, again as I mentioned, excerpts from our implementation guide. And what I've done is set this up to cover all three of our programs, Highly Migratory Species, the NOAA 370 Tuna Tracking and Verification Program and the AMLR program. So the information that you'll see is in different color coded sort of a structure so that you can clearly see the differences in the programs.

And in the first page that you're looking at here for highly migratory species, you will see a list of what are called the PGA records. So next slide please. Slide 11. So on slide 11, what you have is a copy of an ICCAT swordfish document and above that you see a grid. What's used through the automated broker interface and has been used for years to capture information (through) as system called EDI. EDI has 80 characters across a page and then for each record, as it's named, like PG02, PG06, PG14, as you see on this page and as you saw in the proceeding slide, are specific bits of data that will tell us information about this shipment.

So as your software developer sets up your ABI access to the ACE systems, they will use the instructions from our implementation guide to structure it in this manner as you see. So that as you're key stroking your information into



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the system, you'll know exactly where to put that and which PG record numbers they are related to.

So for example, if you're entering the actual permit number that you have as is required. You will enter -- there will be a PG14 line -- and then you'll enter in - keystroke in your actual dealer permit number that's been issued by NMFS. Another point that I'd like to make about this too is that in setting this up, a lot of people have asked us why do you require both a message set and that we still submit the document image. These document images that we collect, nearly all with the exception of a couple, are internationally required documents. They are very complicated and they're somewhat extensive. And we certainly did not want to get to a position where we ask you to keystroke in every bit of information from those documents. However, we still need to collect that information and do reporting after the fact that, there's still requirements to collect the information on those forms. So the simplistic and efficient way for us to collect them in electronic mode is to have them scanned and submitted to us through the document imaging system.

But the message set is designed to capture only that information which is required to make an electronic decision, or an automated clearance, to release the product into trade that you are importing or exporting. So what we've done in setting up our message set and these implementation guides, is to collect only that information which we feel is necessary as the application time to assure that you can efficiently submit the information required to have your product released into trade.

So that said, again, this first slide that I'm showing you here, is for the HMS program. The next slide please. Slide number 12, in the blue here, is the tooth fish program as we call it sometimes, which is just the Antarctic Marine Living Resources Product, it's primarily going to be tooth fish and if we have frozen tooth fish, what you see here in the example is a copy of what's going to be collected on a frozen tooth fish shipment.

Now there are some pre-approval requirements outside of the Customs process for frozen tooth fish and we collect most of the data that way so there's a very limited amount of information that we'll ask for on frozen tooth fish. And we will not collect any document images on frozen tooth fish. If it's fresh tooth fish being flown in then we will collect the document images and there will be little bit more information that's required.

Next slide. This slide is the form that you see on the right is the tooth fish pre-approval form and the specific records from that or data that's from that that we will collect involve, again, just the description of the fish, saying that it's a product not a specific component of another product. That there's actual



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permit numbers provided under PG record 14 and that the pre-approval number that's issued, which is the document you're looking at its provided there, and the common name is provided.

So we would probably also collect and you'll see this in the implementation guidelines -- the weight that is authorized is to be included. So we will check those weights and the permit numbers against the reference source which Customs will have and then again there will be an automated check coming through the system that will be immediate when you enter and submit your data.

Next slide. Number 14. This is for the NOAA 370 program, the third program that I'll mention. And again there's a little bit more extensive information required than just what's shown here in the example. And you'll see that in the implementation guide but you get an idea here on what will be collected. On this particular program, we'll then look for the ocean area of catching gear type which you see towards the bottom of the page of PGS6. I'll also mention that to date, we have not required that a permit be obtained for trade in the NOAA 370 program.

However, under this rule making that is being currently proposed there will be a permit requirement and we will be combining the permit as (Chris) mentioned for all three of these programs into one specific international trade permit for the fisheries service. You would only need to get one permit even if you trade in all three of these programs and you would always use that same number regardless of which type of product you were submitting.

Next slide. Okay this is a copy of another 370 form and again as you look at the form and the blocks in red, you'll begin to see where the information is taken from form to keystroke into the message set, which you would enter. So for example, the ocean area of catch and the type of means by which this was harvested are all going to be taken from the form and actually keystroked into the message set.

So if you look at the top line in the grid there, halfway down you'll see a PG06. It shows you HRV, that shows us that it's a harvest information from the Western Pacific and the PS ,further out in that same line stands for (purse seine) so this was harvested with the (purse seine) that in the Western Pacific. Down to the next - to the PG17, you'll see a more specific description. It says skip jack tuna and further description about that particular tuna.

So these are some of the types of things that we would be collecting. The last line on there is a PG31 record that tells us which the vessel country from



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where the flag state is of the vessel that harvested it. So here you see a JP on that row, we can tell that this is harvested by a Japanese vessel.

Next slide please. So the responsibilities under these new protocols is that the import of record, would obtain the fisheries international trade permit, that's the new permit that we talked about, and then provide the paper documents to their custom broker or whoever's their filer. And then the next person would submit the entry file and then submit that data and document to Customs through the ACE process using the message set, and using the document image system. And then lastly, most folks will have to contact or contract with a software developer to set this up for them so that they can use the automated broker interface to submit the data and then also provide the document images to us.

So lastly I would just send out a plea that folks again take a close look at those dates and note that the fact that we pretty much need to have everybody set up an operational by July of this year and that we also would like to see people pilot testing this further and actually using the system. So the process is that you actually have to become ACE certified, and you contact your client rep at CBP to do that if you have not already.

You have your software developer build the software for you using the implementation guidelines and CATAIR.. And then once that's done, you do some testing. They have a certification environment that's a test environment for the process and then once you move through and have success in the test environment, you'd go to the message set where you'll be submitting the message set in DIS into the production environment which is a natural test on the system.

But then there would be a -- an actual shipment I should say -- a real shipment that would be coming in and we will watch those carefully the first couple times you submit them and then after open the door for you to just continue using the system. That pilot system process can be used anytime it's set up between now and when the rule goes into effect. So again, even though the rule isn't in effect yet, we are looking for volunteers to test a part of this before July so that we have people up and working in operational mode.

So that said, the last note that I would make is there's always the possibility for exceptions and in this case, there's overlap of different agencies as well. And in our use of the import process, everything that - or practically everything - that is submitted to NMFS requirements will also have an FDA requirement of prior notice. Now I say there are exceptions because then there will be a couple things that aren't consumable ([products] that would not required to be reported in advance with FDA.



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But literally everything that is a submission for the National Marine Fishery Service will also require an FDA prior notice report to be filed as well. So what happens is you have a different set of sequence [required] for NMFS and in then following, a sequence for the FDA requirements as well. So if you get the release completed and the may proceed message that Chris' referenced, you would have to have a successful automated filing for both us and the FDA. Something - for example - such as a tuna product.

So, that said, I think I've covered everything. Next page. Slide. There's some resource and comments opportunities here so take a look at these links. You can comment on the proposal and we would invite you to take a look at rule and see how it works. We have [opportunity for] comments with that and then there's a link here that shows you access to the documents and you're certainly welcome to and encouraged to take a look at that. A link, -- when you're ready, -- contact me and we'll be happy to touch base and work with CBP to do some pilot testing.

So again, my thanks for your participation and I'll turn it back over to (Laurel).

(Laurel Bryant): Thanks (Dale) and I believe on the last slide there's also contact information that - through (Mark Wildman) you can reach also (Chris Rogers) and (Dale). And we welcome you reaching out to us, I know there's a lot of information so there may be some heads spinning out there. Before I ask the operator to open it up for Q&As, you know, please give us your name and your affiliation so we know who we're talking to. And operator if you could just remind folks how to get in the question queue.

(Operator): Absolutely. To ask a question, please press star 1. You will be prompted to record your first and last name along with your affiliation. To withdraw your request, press star 2. Once again, press star 1 to ask a question and please stand by for our first question.

(Laurel Bryant): And while we're waiting maybe the first question to come in, I would also say I know that at yesterday's webinar, a question came up about the IDTS program, as (Chris) and (Dale) have pointed out this has been a long time in the making, this is fully government, every agency has their piece of it but this also will be providing the platform for any of the traceability program when that proposed rule comes forward. So I wanted to put that in context for folks.

Operator, do we have our first question?



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Coordinator: Our first question comes from (Roger Clark), with Williams Clark Company. Your line is now open.

(Roger Clark): Can you give us an overview of how NOAA will be operating between March 1st and July as far as documentation and operations when portions of the ACS system will be shutting down?

(Chris Rogers): Yes, this is (Chris Rogers) so during that period, the hybrid filing will be allowed. In other words, you would follow current regulations for submitting the information, paper based information, through the specified channels, whether you're faxing, mailing, couriering or using processes to get those documents to the National Marine Fishery Services. But the general entry, entry summary information will have to be filed through ACE.

So once the July date arrives, the hybrid filing would no longer be allowed. In other words, no paper to (unintelligible) and electronic to Customs it has to be all electronic through Customs through the Portal, including the message set and the DIS from that July point on.

(Laurel Bryant): (Roger) did that answer your question?

(Roger Clark): Yes, thank you

(Laurel Bryant): You bet. Is there anyone else?

Coordinator: At this time there is no other questions. But again, as a reminder, to ask a question please press Star 1.

(Laurel Bryant): We'll give it just a couple more minutes. (Chris) do you have any wrap up comments you'd like to give.

(Chris Rogers): Well just a follow up on that last question from (Roger). Customs will be putting out a final rule on its own accord. And we will be putting out a final rule for our program. Obviously we have to coincide. That July date, once it's determined, as the reference point for both agencies so that we're in synchronization with respect to the allowance for hybrid filing until some certain (unintelligible) some date certain that will be communicated by both agencies to the public and certainly if we have your information, we will be trying to send it out in a direct mailing or email to you, to apprise you of that date certain.

(Laurel Bryant): Great. Operator, looks like we may have a couple others?



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Coordinator: We do have a question from (Roger Clark) again. Your line is - give me one second - your line is now open.

(Roger Clark): Just as a follow up to my first question and it's regards to multiple agencies. February 28th, FDA will be coming online and mandatory within the ACE system. How are we going to file a hybrid entry when we're filing the documentation information through ACE for FDA, yet you say we can file through ACS for the NOAA Documentation.

(Dale Jones): Can I - you want me to get that (Chris)?

(Chris Rogers): Sure.

(Dale Jones): Yes, this is (Dale) again, (Roger), the ACS will be shut down as of February 28th, but what you would do in that particular case is you would file electronically through ACE instead of ACS. Everything that FDA requires and everything that Customs require, so your entry, entry summary, your FDA prior notice, those things would all be filed through the ACE systems, using ABI.

But then the paper requirements that we still have - such as sending us copies of your documentation and things - you would still just do that the same way that you would now continuing through whatever date is established in July to provide that paperwork to us through DIS. Unless of course there's one exception that you're pilot testing and then you would be able submit everything to us three ways as of February 28th. If you were up and running as a pilot tester for us, you could do it all electronically.

(Roger Clark): There would be no data fields required for NOAA during the March and the July date unless you're into the pilot is that correct?

(Dale Jones): That's exactly right. That's correct.

(Roger Clark): Thank you.

Coordinator: Our next question comes from (Fred Mansfield) with Stokes Fish Company, your line is now open.

(Fred Mansfield): Hi, I had a question on the swordfish and tuna. We import both right now and what we do now is we actually send the documents via email to NOAA in Louisiana, is there going to be like a portal on the computer that we have to fill up for both tuna and swordfish that we do electronically. Is that what you're asking?



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(Dale Jones): There will be a requirement as of July to submit data that you would keystroke in and it's not necessarily through the portal but it's through the use of ABI via the broker interface to submit it to ACE. And then even though you're doing two different programs for the National Marine Fishery Service, so let's give you an example.

If you were to import frozen big eye tuna, frozen big eye tuna will require both a tuna tracking verification program TTVP submission of the 370 form to us and it will also require HMS related submission. And let's just say it was caught if it was caught in the Atlantic there would be a requirement to submit an ICCAT tuna form under that as well.

So in that case what you would then have is two different sets of lines that you would put into the message set. There would be a series of data that you would fill out as required for the 370 program and then following that would be a series of data that you would fill out for the HMS program and then after that, you would have the FDA required information on the pre-approval prior notice that they require.

So it's just a matter of sequencing actually that you fill out through the ABI program then you just upload the document copies and submit it.

(Fred Mansfield): Okay, thank you very much.

Coordinator: And as a reminder to ask a question, please press star 1.

(Laurel Bryant): I'm not seeing anybody have any questions but I know (Chris) and (Dale) are interested in getting your input on - both through the public comment process and certainly through contacting them directly. And (Dale) we did talk about yesterday, if there's going to be any follow up guidance or training or something like that. I'm just mentioning to this group that if there is interest in that, it would be helpful for us to hear from them on that and we can think about that further.

Operator, I see one more question that has just come in the queue.

Coordinator: Yes, our next question comes from (Thomas Darrel) with Big Blue Ocean, your line is now open.

(Thomas Darrel): Hi how are you. I know you stated it at the beginning of the webinar but I wanted to see if you can just say again how we can get the deck for the PDFs that were on the file.



NOAA FISHERIES

(Laurel Bryant): Oh, (Thomas) that's to me. On the web page - on the Fisheries web page which is at NMFS.NOAA.gov. When you go to our front page, over on the left hand side, you'll see the navigation buttons. Click in on programs and when the drop box comes down, you'll see international affairs and in the center of the international affairs page, there is a link to a - essentially a splash page where all the information relevant to the ITDS proposed rule and activities are going to be posted.

And to the right of that page you will find a link to a PDF of this Power Point. You'll also find a link to the FR to make comments directly.

(Thomas Darrel): Okay, great. Thank you so much.

(Laurel Bryant): You bet. Okay I think with that I'm going to thank everybody for their time today, I really appreciate it. And we look forward to getting your comments and we will continue to stay in touch as this initiative moves forward. Thank you very much, have a good afternoon.

(Operator): Thank you. This concludes today's conference. Participants you may disconnect at this time. Speakers please wait for transfer.

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